

850 CITATION SUPPLEMENTAL & AMENDED PETITION

JOSEPH L. JAMES

VS 93303B

BYRD MEMORIAL HOSPITAL, ET AL

THIRTIETH JUDICIAL DISTRICT COURT

PARISH OF VERNON

STATE OF LOUISIANA

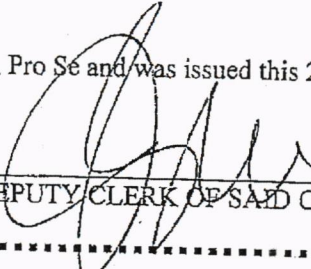


TO: Louisiana Outpatient Clinic in Leesville

PARISH OF VERNON

You are hereby summoned to comply with the demand of the Supplemental and Amended Petition, a true and faithful copy whereof accompanies this Citation, or to make an appearance by filing an Answer or other pleading thereto, in writing, with the Clerk of Court at this office in the City of Leesville within the time remaining for pleading to the original petition heretofore served upon you or within ten (10) days after service hereof, whichever period is longer; and your failure to so comply will subject you to the penalty of having a default judgment rendered against you.

This service was requested by Petitioner, Pro Se and was issued this 24th day of July, 2017.

BY: 
DEPUTY CLERK OF SAID COURT

SERVICE INFORMATION

RECEIVED: _____ (DATE) _____ (PARISH)

PERSONAL SERVICE: _____ (DATE)

DOMICILIARY SERVICE: On the said party herein named by leaving same at the domicile in the hands of _____ a person apparently over the age of seventeen, living and residing in said domicile, said party having been absent from the residence at the time of service.

SERVICE: _____ (DATE) DEPUTY SHERIFF: _____

SERVICE \$

MILEAGE \$

TOTAL \$

GOVERNMENT
EXHIBIT
A

Joseph L. James

30th Judicial District Court

Versus NO. 93303

Parish of Vernon

Byrd Memorial Hospital Emergency
Room in Leesville Louisiana, et al.

State of Louisiana

Byrd Memorial Hospital Emergency
Room Doctor Lemme in Leesville
Louisiana et al.

Deputy Clerk

Louisiana Outpatient Clinic in Leesville
Louisiana, et al.

Louisiana Outpatient Clinic Doctor Lemme
in Leesville Louisiana, et al.

Leesville Louisiana City Police Department, et al.
City of Leesville Louisiana, et al.
Not Limited To These Entities Only

Petitioner For Damages Supplemental Brief

May It Please The Court, now comes plaintiff and
petitioner, Joseph L. James, whom presents this Petition
For Damages Supplemental Brief to supplement
all prior petitions and/or motions respectively therein,
thus, this petition to be as if the original and conjunction
with all others and in so doing be in compliance with all Factors of Law

In so doing, respectively herein, thus, to be served to defendants lawfully and petitioner's obligations to be satisfied by Law in doing so.

Now Into Court Comes, Joseph L. James, whom resides and domiciled in the State of Louisiana, who respectfully represents the following

(1)

Made Defendants herein are:

- (1) Byrd Memorial Hospital Emergency Room in Leesville Louisiana, et al.
- (2) Byrd Memorial Hospital Emergency Room Doctor Lemme in Leesville Louisiana et al.
- (3) Louisiana Outpatient Clinic in Leesville Louisiana et al.
- (4) Louisiana Outpatient Clinic in Leesville Louisiana, Doctor Lemme, et al.
- (5) Leesville Louisiana City Police Department, et al.
- (6) City of Leesville Louisiana, et al.
- (7) Not Limited To These Entities or Individuals Only

(2)

In 2015 and 2016, I believe, petitioner was ^{treated} for High Blood Pressure at the Louisiana Outpatient Clinic in Leesville Louisiana by Doctor Lemme and treated for High Blood Pressure at Byrd Memorial Hospital

Emergency Room in Leesville Louisiana by Doctor Lemme and later, a few days or weeks, ~~He~~ was treated again for High Blood Pressure at Byrd Memorial Hospital Emergency Room by an unknown Doctor as of date. As a result of ^{Medical} treatment at these times by doctors, petitioner has memory distortion, problems cataloging events in his past, moments of being dazed among other serious Mental and physical injuries to be named in this cause in a lawful and timely manner.

Petitioner swears to the Best of his ability the Facts presented herein are his belief and Truth, respectively, thus,

(3)

Sometime in 2016^{or 2015} petitioner was diagnosed with High Blood Pressure at the Louisiana Outpatient Clinic in Leesville Louisiana and prescribed medication by Doctor Lemme.

(4)

Shortly thereafter petitioner's blood pressure diagnosed as high at the Byrd Memorial Hospital Emergency Room in Leesville Louisiana where blood pressure medication was again prescribed to petitioner by Doctor Lemme.

(5)

Shortly after this, petitioner was again seen at the Byrd Memorial Hospital Emergency Room in Leesville Louisiana diagnosed with High Blood Pressure. At this time the doctor questioned petitioner ~~as to~~ as to why he was taking so many and different Blood Pressure medications. Thus this doctor discovered petitioner was being "overdosed" of blood pressure medications that were being given to him. This doctor stated that petitioner was being given blood pressure medications that were prescribed on (2) Two separate "Doctor Visits" thus petitioner was having over dosaged medications

Causing an "High Blood Pressure overdose." This doctor told me one of the ordered prescribed medications "should have been cancelled" and "not to have been given to me together," thus this Doctor ordered me to a E.K.G., Brain Scan, and other tests that may show serious bodily injury from the ~~over~~^{S.G.} "over dosages" of medications that were prescribed and administered to petitioner together, as if one blood pressure medication remedy, to solve petitioner's high blood pressure diagnoses by the respective Doctors thereof on separate doctors visits.

(6)

Petitioner was held against his will during all (3) three of the "Doctors Visits" mentioned hereinabove at the City Police Department in Leesville Louisiana, thus, all prescribed medications were administered to petitioner from this Department and Staff, respectively,

both sets of prescribed High blood pressure medications prescribed to petitioner at the Louisiana Outpatient Clinic by Doctor Lemme and the set of prescribed High Blood Pressure medications prescribed by Doctor Lemme at the Byrd Memorial Hospital Emergency Room were being administered to petitioner by this Department and Staff together causing the "overdosage of High Blood Pressure Medications" to petitioner, multiple times daily, until petitioner's condition was so severe he was rushed to the Byrd Memorial Hospital Emergency Room. This is when, after questions by the emergency room doctor, he discovered petitioner was being administered an "overdosage of High Blood Pressure medications" on a daily basis multiple times, this doctor expressed this to petitioner and the Officers with petitioner of the Leesville City Police Department, also explaining that is was (2) two different medication set of

prescriptions, they were also multiple different names, thus multiple different colored pills therein and one "set" of prescriptions should have been "cancelled or discontinued administering to petitioner".

As a result of this malpractice, and petitioner given an "overdosage of High Blood Pressure Medications" multiple times daily, this Doctor ordered multiple tests to be performed on petitioner "that continued overdosage of High Blood Pressure medications" may have caused to his person physically at Byrd Hospital. Petitioner was advised by this Doctor to seek follow up Doctor visits and more Tests, also to seek an Mental evaluation.

(7)

Petitioner made an appointment with the area mental health Clinic, Caring Choices in Leesville Louisiana, after the above mentioned incident occurred. Petitioner was diagnosed with the following,

Severe anxiety and depression, manic depressant, Bi-Polar, ADD, paranoid schizophrenia, I believe, along with other issues, to be presented by Medical Records forthcoming, ~~from~~ ^{the} ~~the~~ that were caused by the "daily overdosage of high blood pressure medications" administered to petitioner in the abovementioned herein accident/incident, respectively.

(8)

It is Petitioner's belief that the injuries he sustained, mentioned herein and forthcoming, were caused by the negligence and malpractice of the defendants, their employees, agents and representatives, jointly, severally and in solidio caused the following, though non-exclusive particulars;

- (a) Failing to properly warn the general public of the physical and mental damage that may occur when multiple different High Blood Pressure Medications are administered to their persons from different Doctors prescriptions and Visits respectively, or hazards,

- (b) Failing to properly warn the general public of the hazards that cause serious physical and mental harm by doctors when they prescribe certain medications together and with one another
- (c) Failing to properly warn the general public ^{J.J.} of the serious physical and mental harm when past prescribed medications are Not Cancelled or Discontinued and taken in conjunction with present prescribed medications for the same diagnoses by a doctor
- (d) Failing to properly cancel and discontinue prescribed prior medications when a new prescription of medications is administered to the general public and persons
- (e) Failing to properly have knowledge of Medications that when prescribed and administered ~~in~~ causes serious physical and mental harm to the general public and persons
- (f) Failing to properly be trained in the medical field prior to administering prescribed medications to the general public and persons
- (g) Any and all other acts of negligence to the general public and persons shown at trial committed by the defendants

(9)

As a result of the hereinabove incident and accident petitioner sustained the following, though non-exclusive injuries,

- (a) Moments of severe headaches,
 - (b) Moments of blurred vision and seeing spots,
 - (c) Moments of memory distortion / confusion,
 - (d) Moments of failing to remember sequenced events, in his life,
 - (e) Moments of thought failure and uncontrollable crying,
 - (f) Moments of "out of body" perception to daily events,
 - (g) Moments of forgetting to breathe properly,
 - (h) Moments of dizziness,
 - (i) Moments of daily unable to relax, being tight anxious,
 - (j) Daily moments of unable to stop thought from jumping around and unable to read without mind "spacing out" on other issues,
 - (k) Current Severe anxiety and depression,
 - (l) Currently manic depressant,
 - (m) currently bi-polar,
 - (n) Current Attention Disorder Deficit, (ADD),
 - (o) Currently paranoid schizophrenia,
 - (p) Current post traumatic stress disorder (PTSD),
 - (q) Paranoid of Medications, Doctors and Hospitals, and all issues related to each of these being untrustworthy,
 - (r) Loss of Freedom, can't remember breaking any laws to be in jail,
- (10)

thus,

As a result of this accident/incident and malpractice plaintiff, petitioner, Joseph L. James sustained the following, though non-exclusive damages,

- (a) past, present and future physical pain and suffering,
- (b) past, present and future mental pain and suffering,
- (c) past, present and future loss of employment and wages,

- (d) past, present and future loss of enjoyment of Life,
 - (e) past, present and future medical expenses and personal property and,
 - (f) past, present and future disability and earning capacity,
 - (g) past, present and future loss of Freedom
- (II)

As a result of the accidents and incidents, malpractice described hereinabove and throughout this petition plaintiff, petitioner Joseph L. James is entitled to receive and recover from the defendants herein, jointly, severally and in solido such damages as is reasonable in the premises, together with legal interest from the date of judicial demand, until paid, and for all costs of these proceedings and Legal Fees. Wherefor Petitioner Prays,

that after all proceedings had, there be judgement rendered herein in favor of plaintiff, petitioner Joseph L. James, and against defendants herein for damages as are reasonable in the premises, together with

legal interest thereon from the date of these proceedings, Court Costs and Legal Fees, and,

For all full, just and equitable relief.

Done this 8th day of July 2017.

Please serve all the defendants herein with this Petition for Damages Supplemental Brief, respectively, and in, and thru, completion of this service all factors of Law and obligations are satisfied by Plaintiff, Petitioner to be complete as due course of Law proceeds within this Honorable Court and Cause, respectively. Thus, in so doing, service be to perfection to defendants by this Honorable Court.

Respectfully Submitted By,

~~Joseph L. James~~

Joseph L. James

147 Jand J Lane

Leesville, La. 71446

American Citizen

SERVE

Please Serve, defendants

Blue Williams, L.L.P.
Kurt S. Blankenship
Counselor at Law
3421 North Causeway Blvd., Suite 900
Metairie, La. 70002-3760
Counselor of Law Representing
Byrd Memorial Hospital Emergency Room
And Doctor Lemme of Said Hospital et al.

Louisiana Outpatient Clinic in Leesville Louisiana
And Doctor Lemme of Said Clinic et al.
Counselor of Record (Unknown)
Physical Address (Unknown)

May the Court please provide this Address with due course
of being served with this Petition please.

City of Leesville Louisiana, et al.
Counsel of Record (Unknown)
Physical Address (Unknown)

May the Court please provide this Address with due course
of being served with this Petition please.

Leesville Louisiana City Police Department, et al.
Counsel of Record (Unknown)
Physical Address (Unknown)

May the Court please provide this Address with due course
of being served with this Petition please.

SERVE

Plaintiff Prays,

that the addresses be provided by the Clerk of Court for the 30th J.D.C. that are needed to execute service to perfection of the petition herein to the defendants in this Honorable cause and, in so doing, due course of Law and proceedings continue thus.

Plaintiff further prays,

that a copy of this Petition For Damages Supplemental Brief, a Notice of Service to the defendants and whom, and a Notice of Receipt, be provided to plaintiff, petitioner Joseph L. James, for legal records associated with all Factors of Law and accurately presenting future motions related to this cause herein, please.

Certificate of Service

Mailed thru the U.S. Postal Service to the Clerk of Court for the 30th Judicial District Court P.O. Box 40, Leesville Louisiana, 71496, this Petitioner For Damages Supplemental Brief on this day of July the 8th 2017.

Sincerely and Respectfully Yours,

Joseph L. James

Joseph L. James

P.O. Box 649 / 147 Jand J Lane
Leesville, La. 71446

I HEREBY CERTIFY THAT THE ABOVE AND
FORGOING IS A TRUE AND CORRECT COPY OF
THE ORIGINAL
BY CLERK OF COURT VERNON PARISH, LA.